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PLAINTIFF'S SELECTION OF FIFTY DOCUMENTS FOR IN CAMERA REVIEW
PURSUANT TO ORDER OF COURT DATED APRIL, 2022

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SCHEDULE A

PLAINTIFF'S SELECTION OF FIFTY DOCUMENTS FOR IN CAMERA REVIEW
PURSUANT TO ORDER OF COURT DATED APRIL, 2022**From Defendants' May 9, 2022 Supplemental Privilege Log**

Total	Def #	Date	Defs' Description	Pl's Note
1	3	3/6/14	Communications with in house counsel regarding Citi's strategy for communicating with the press	Public Relations staff present
2	9	10/30/13	Communications with in house counsel regarding Citi's strategy for communicating with the press	Public Relations staff present
3	10	10/15/13	Communications with in house counsel regarding Citi's strategy for communicating with the press; Communications with in house counsel regarding strategy for communicating with Ramchandani in connection with the FX investigation	Public Relations staff present
4	618	5/19/15	Communications between non-lawyers reflecting legal advice and/or made in furtherance of rendering legal advice in connection with Citi's guilty plea in the FX investigation	Non-lawyer communication
5	605	5/19/15	Communications between non-lawyers reflecting legal advice and/or made in furtherance of rendering legal advice in connection with Citi's guilty plea in the FX investigation	Non-lawyer communication
6	681	10/30/13	Communications between non-lawyers reflecting legal advice and/or in furtherance of rendering legal advice regarding Ramchandani's suspension, termination and/or cancellation of compensation	Non-lawyer communication
7	682	10/30/13	Communications between non-lawyers reflecting legal advice and/or in furtherance of rendering legal advice regarding Ramchandani's suspension, termination and/or cancellation of compensation	Non-lawyer communication
8	687	10/30/13	Communications with in house counsel regarding Ramchandani's suspension, termination and/or cancellation of compensation; 7. In house commns re press strategy	Press Strategy
9	132	10/23/18	Communications between non-lawyers reflecting legal advice and/or in furtherance of rendering legal advice regarding the Department of Justice's FX investigation	Non-lawyer communication
10	143	10/7/18	Communications between non-lawyers reflecting legal advice and/or in furtherance of rendering legal advice regarding the Department of Justice's FX investigation	Non-lawyer communication
11	147	7/21/16	Communications between non-lawyers reflecting legal advice and/or made in furtherance of rendering legal advice in connection with Citi's strategy for communicating with the press	Non-lawyer communication
12	186	10/8/18	Communications between non-lawyers reflecting legal advice and/or in furtherance of rendering legal advice regarding the Department of Justice's FX investigation	Non-lawyer communication
13	213	3/4/14	Communications with in house counsel regarding Ramchandani's suspension, termination and/or cancellation of	Talking points memo

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Total	Def #	Date	Defs' Description	Pl's Note
			compensation	
14	214	10/31/13	Communications with in house counsel regarding Citi's investigation of Ramchandani's FX trading conduct; Communications with in house counsel regarding Ramchandani's suspension, termination and/or cancellation of Compensation	Unclear from description if privileged or work product
15	1089	4/23/15	Redaction of communications with in house counsel regarding Ramchandani's suspension, termination and/or cancellation of compensation	Unclear from description if privileged or work product
16	1067	10/15/13	Redaction of communications with in house counsel regarding Citi's strategy for communicating with the press	Public Relations staff present
17	1071	12/5/13	Redaction of communications between non-lawyers in furtherance of rendering legal advice regarding Citi's strategy for communicating with the press	Non-lawyer communication
18	952	11/12/14	Communications with in house counsel regarding Citi's investigation of Ramchandani's FX trading conduct; 8. In house commns re RR commns	Public Relations staff present
19	1128	6/16/14	Outside counsel's work product memorandum prepared after counsel's June 11, 2014 meeting with the DOJ, CFTC, FRBNY and the OCC	Memo of Gov't Meetings
20	1129	6/17/14	Outside counsel's work product memorandum prepared after counsel's January 30, 2014 meeting with the DOJ and CFTC	Memo of Gov't Meetings
21	1130	8/21/14	Outside counsel's work product memorandum prepared after counsel's March 5, 2014 meeting with the DOJ, CFTC, FRBNY and the OCC	Memo of Gov't Meetings
22	1131	11/14/14	Outside counsel's work product memorandum prepared after counsel's October 22, 2014 meeting with the DOJ	Memo of Gov't Meetings
23	1132	11/17/14	Outside counsel's work product memorandum prepared after counsel's November 12, 2014 meeting with the DOJ Antitrust Division	Memo of Gov't Meetings
24	1133	3/23/15	Outside counsel's work product memorandum prepared after counsel's March 9, 2015 meeting with the DOJ	Memo of Gov't Meetings
25	1134	3/27/15	Outside counsel's work product memorandum prepared after counsel's March 24, 2015 meeting with the DOJ Antitrust Division	Memo of Gov't Meetings
26	1135	4/6/15	Outside counsel's work product memorandum prepared after counsel's April 2, 2015 meeting with the DOJ Antitrust Division	Memo of Gov't Meetings
27	1136	4/15/15	Outside counsel's work product memorandum prepared after counsel's April 9, 2015 meeting with the DOJ	Memo of Gov't Meetings
28	1137	12/17/14	Outside counsel's work product notes prepared after counsel's December 15, 2015 call with the DOJ	Memo of Gov't Meetings
29	1138	3/10/15	Outside counsel's work product notes prepared after counsel's March 9, 2015 meeting with the DOJ Fraud Division	Memo of Gov't Meetings

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Total	Def #	Date	Defs' Description	Pl's Note
30	1139	11/11/14	Outside counsel's work product notes prepared after counsel's November 10, 2014 call with the DOJ Fraud and Antitrust Divisions and the FBI	Memo of Gov't Meetings
31	1140	5/7/14	Outside counsel's work product notes prepared after counsel's May 2, 2014 call with the DOJ Fraud and Antitrust Divisions	Memo of Gov't Meetings
32	1141	10/14/14	Outside counsel's work product notes prepared after counsel's October 14, 2014 call with the DOJ Fraud and Antitrust Divisions, CFTC and FBI	Memo of Gov't Meetings
33	1142	2/19/15	Outside counsel's work product notes prepared after counsel's February 19, 2015 meeting with the DOJ Fraud and Antitrust Divisions	Memo of Gov't Meetings
34	805	1/10/14	Communications with in house counsel regarding Citi's strategy for communicating with the press	Press Strategy
35	959	6/11/13	Communications with in house counsel regarding Citi's investigation of Ramchandani's FX trading conduct; 7. In house commns re press strategy	Press Strategy
36	973	1/10/14	Communications between non-lawyers reflecting legal advice and/or in furtherance of rendering legal advice regarding Citi's strategy for communicating with the press	Public Relations staff present
37	1005	10/30/13	Redaction of communications with in house counsel regarding Citi's strategy for communicating with the press	Public Relations staff present
38	1029	1/10/14	Redaction of communications between non-lawyers reflecting legal advice and communications with in house counsel regarding Ramchandani's suspension, termination and/or cancellation of compensation and Citi's strategy for communicating with the press	Public Relations staff present
39	1031	10/10/18	Redaction of communications with in house counsel regarding the Department of Justice's FX investigation and Citi's investigation of Ramchandani's FX trading conduct	Public Relations staff present
40	1076	1/10/17	Redaction of communications with in house counsel regarding the Department of Justice's FX investigation	Public Relations staff present
41	633	5/20/15	Communications between non-lawyers reflecting legal advice and/or made in furtherance of rendering legal advice in connection with Citi's guilty plea in the FX investigation	Non-lawyer communication
42	1002	1/15/14	Communications with in house counsel regarding Ramchandani's suspension, termination and/or cancellation of compensation	Pl's Termination

From Defendants' April 19, 2022 Categorical Privilege Log

Total	Def #	Date	Defs' Description	Pl's Note
43	113	10/31/13	RE: FX investigations--privileged and confidential	Public Relations staff present

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Total	Def #	Date	Defs' Description	Pl's Note
44	930	4/14/15	RE: Talking Points for DOJ FX Call re Entity - privileged and confidential	Talking points for DOJ Call
45	978	1/10/17	FW: Update on DOJ Charging Decisions - privileged & confidential	DOJ Charging decisions
46	997	4/3/14	FW: Privileged and Confidential -- New DOJ Request	New DOJ Request
47	1193	4/14/15	RE: Talking Points for DOJ FX Call re Entity - privileged and confidential	Talking points for DOJ Call
48	1265	1/5/17	RE: Call with Carrie Syme (DOJ)	Call with DOJ

From Defendants' May 19, 2022 Second Supplemental Privilege Log

Total	Def #	Date	Defs' Description	Pl's Note
49	1	3/2/14	1/31/14 Presentation to FRBNY and OCC	Notes of Gov't Meeting
50	2	2/6/15	DOJ Meeting Feb 4 2015	Notes of Gov't Meeting